28	7	I.			
27	Plaintiff, vs.	JOINT STIPULATION AND [PROPOSED] ORDER CONTINUING CASE MANAGEMENT CONFERENCE			
26	INC.,				
25	LHOIST NORTH AMERICA OF ARIZONA,	Casa Number: 5:16-ov-1321			
24	NORTHERN DISTRICT OF CALL	L OLGINI DINIVODE DI LIDIOI			
23					
22		DISTRICT COURT			
21	International Union of Operating Engineers				
20					
19	Kenneth C. Absalom (State Bar No. 114607) George R. Nemiroff (State Bar No. 262058) Law Office of Kenneth C. Absalom 200 Montgomery St., Suite 905 San Francisco, California, 94104 Telephone: (415) 392-5040 E-mail: kenabsalom@333law.com nemiroff@333law.com  Attorneys for Defendant International Union of Operating Engineers Local No. 3				
18	Aerospace Workers, Local Lodge No. 93, International Brotherhood of Teamsters, Chauffeurs, Warehousemen and Helpers of America, Local No. 890, and International Brotherhood of Electrical Workers, Local No. 234  Kenneth C. Absalom (State Bar No. 114607) George R. Nemiroff (State Bar No. 262058) Law Office of Kenneth C. Absalom 200 Montgomery St., Suite 905 San Francisco, California, 94104 Telephone: (415) 392-5040 E-mail: kenabsalom@333law.com nemiroff@333law.com  Attorneys for Defendant International Union of Operating Engineers				
17	Law Office of Kenneth C. Absalom				
16	Kenneth C. Absalom (State Bar No. 114607)  George P. Nemiroff (State Bar No. 262058)				
15					
14	America, Local No. 890, and International				
13	International Brotherhood of Teamsters,	nor J. Dale (State Bar No. 274123)  (XSON LEWIS P.C. California Street, 9th Floor Francisco, California 94111 psychone: (415) 394-9400 nail: dan.hartsfield@jacksonlewis.com  Domeys for Plaintiff iist North America of Arizona, Inc. 37 and A. Rosenfeld (State Bar No. 058163) en P. Sencer (State Bar No. 233488) inberg, Roger & Rosenfeld, rofessional Corporation 1 Marina Village Parkway, Suite 200 meda, California 94501 ephone: (510) 337-1001 nail: drosenfeld@unioneounsel.net esencer@unioneounsel.net esencer@unioneounsel.net esencer@unioneounsel.net esencer@unioneounsel.net esencer@unioneounsel.net ornational Association of Machinists and ospace Workers, Local Lodge No. 93, ernational Brotherhood of Teamsters, mifeurs, Warehousemen and Helpers of erica, Local No. 890, and International therhood of Electrical Workers, Local No. 14607) orge R. Nemiroff (State Bar No. 262058) vOffice of Kenneth C. Absalom (State Bar No. 262058) vOffice of Kenneth C. Absalom Montgomery St., Suite 905  1 Francisco, California, 94104 ephone: (415) 392-5040 nail: kenabsalom@333law.com nemiroff@333law.com  orneys for Defendant ernational Union of Operating Engineers and No. 3  UNITED STATES DISTRICT COURT  NORTHERN DISTRICT OF CALIFORNIA- SAN JOSE DIVISION  OIST NORTH AMERICA OF ARIZONA, C., Plaintiff, Proposed Option Court of Court			
12	Attorneys for Defendants International Association of Machinists and				
11					
10	Telephone: (510) 337-1001 E-mail: drosenfeld@unioncounsel.net				
9	Alameda, California 94501				
8	A Professional Corporation 1001 Marina Village Parkway, Suite 200 Alameda, California 94501 Telephone: (510) 337-1001 E-mail: drosenfeld@unioncounsel.net				
7	CCKSON LEWIS P.C.  of California Street, 9th Floor in Francisco, California 94111 slephone: (415) 394-9400 mail: dan.hartsfield@jacksonlewis.com  ttorneys for Plaintiff noist North America of Arizona, Inc.  avid A. Rosenfeld (State Bar No. 058163) aren P. Sencer (State Bar No. 233488) einberg, Roger & Rosenfeld, Professional Corporation 001 Marina Village Parkway, Suite 200 lameda, California 94501 slephone: (510) 337-1001 -mail: drosenfeld@unioncounsel.net ttorneys for Defendants ternational Association of Machinists and erospace Workers, Local Lodge No. 93, ternational Brotherhood of Teamsters, hauffeurs, Warehousemen and Helpers of merica, Local No. 890, and International rotherhood of Electrical Workers, Local No.  4 enneth C. Absalom (State Bar No. 114607) eorge R. Nemiroff (State Bar No. 262058) aw Office of Kenneth C. Absalom 00 Montgomery St., Suite 905 an Francisco, California, 94104 elephone: (415) 392-5040 -mail: kenabsalom@333law.com memiroff@333law.com ttorneys for Defendant tternational Union of Operating Engineers ocal No. 3				
6	Lhoist North America of Arizona, Inc.				
5	Attorneys for Plaintiff				
4	Telephone: (415) 394-9400 E-mail: dan.hartsfield@jacksonlewis.com				
3	50 California Street, 9th Floor San Francisco, California 94111				
2	Conor J. Dale (State Bar No. 274123)  JACKSON LEWIS P.C.				
1	Dan Hartsfield (Tex. Bar No. 0917088)				

1 2	INTERNATIONAL ASSOCIATION OF MACHINISTS AND AEROSPACE WORKERS, LOCAL LODGE NO. 93,		
3	INTERNATIONAL BROTHERHOOD OF TEAMSTERS, CHAUFFEURS,		
4	WAREHOUSEMEN AND HELPERS OF AMERICA, LOCAL NO. 890,		
5	INTERNATIONAL BROTHERHOOD OF BOILERMAKERS, IRON SHIP BUILDERS,		
6	BLACKSMITHS, FORGERS AND HELPERS, AFL-CIO, CEMENT, LIME, GYPSUM AND		
7	ALLIED WORKERS DIVISION, DNCL, INTERNATIONAL BROTHERHOOD OF		
8	ELECTRICAL WORKERS, LOCAL NO. 234, AND INTERNATIONAL UNION OF		
9	OPERATING ENGINEERS, LOCAL NO. 3,		
10	Defendants.		
11	Pursuant to United States District Court, Northern District of California Local Rule 6-2,		
12	the following Stipulation is entered into by Plaintiff LHOIST NORTH AMERICA OF		
13	ARIZONA, INC. ("Plaintiff") and Defendants INTERNATIONAL ASSOCIATION OF		
14	MACHINISTS AND AEROSPACE WORKERS, LOCAL LODGE NO. 93, INTERNATIONAL		
15	BROTHERHOOD OF TEAMSTERS, CHAUFFEURS, WAREHOUSEMEN AND HELPERS		
16	OF AMERICA, LOCAL NO. 890, INTERNATIONAL BROTHERHOOD OF ELECTRICAL		
17	WORKERS, LOCAL NO. 234, AND INTERNATIONAL UNION OF OPERATING		
18	ENGINEERS, LOCAL NO. 3 ("Defendants") (collectively, the "Parties") by and through their		
19	counsel of record:		
20	WHEREAS, the Court scheduled a case management conference in the above-referenced		
21	matter for June 15, 2016; and		
22	WHEREAS, Plaintiff has filed a Complaint; and		
23	WHEREAS, Defendants have filed a Motion to Dismiss the Complaint with prejudice;		
24	and		
25	WHEREAS, Defendant's Motion to Dismiss is noticed to be heard on June 29, 2016; and		
26	WHEREAS, Defendant THE INTERNATIONAL BROTHERHOOD OF		
27	BOILERMAKERS, IRON SHIP BUILDERS, BLACKSMITHS, FORGERS AND HELPERS,		
28	AFL-CIO, CEMENT, LIME, GYPSUM, AND ALLIED WORKERS DIVISION, DNCL has yet		

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1 to make an appearance in this case; and WHEREAS, Plaintiffs and Defendant seek to preserve the time and resources of the 2 3 Parties and the Court; IT IS HEREBY STIPULATED AS FOLLOWS: 4 The June 15, 2016 case management conference is continued sixty-three (63) days to 5 August 17, 2016, or to such a date thereafter as the Court may set. The deadlines to complete 6 pre-case management conference tasks including, but not limited to, the service of initial 7 disclosure statements and the filing of a joint case management conference statement, are 8 similarly continued to dates consistent with the continued August 17, 2016 case management 9 10 conference. JACKSON LEWIS P.C. 11 Dated: May 31, 2016 12 /s/ Conor J. Dale By: 13 Dan Hartsfield Conor J. Dale Attorneys for Plaintiff 14 LHOISŤ NORTH AMERICA OF 15 ARIZONA, INC. 16 WEINBERG, ROGER & ROSENFELD Dated: May 31, 2016 17 18 By:/s/ Caren P. Sencer David A. Rosenfeld 19 Caren P. Sencer Attorneys for Defendants 20 INTERNATIONAL ASSOCIATION OF MACHINISTS AND AEROSPACE WORKERS, LOCAL LODGE NO. 93, 21 INTERNATIONAL BROTHERHOOD OF TEAMSTERS, CHAUFFEURS, 22 WAREHOUSEMEN AND HELPERS OF AMERICA, LOCAL NO. 890, AND 23 INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS, LOCAL NO. 24 234 25 // // 26 27 28

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By: Kenneth C. Absalom George R. Nemiroff Kenneth C. Absalom George R. Nemiroff Attorneys for Defendant INTERNATIONAL UNION OF OPERATING ENGINEERS LOCAL NO  PURSUANT TO THE STIPULATION OF THE PARTIES, IT IS SO ORDERED.  Dated: June 2 , 2016			
By: A George R. Nemiroff Kenneth C. Absalom George R. Nemiroff Attorneys for Defendant INTERNATIONAL UNION OF OPERATING ENGINEERS LOCAL NO  Reprosed ORDER PURSUANT TO THE STIPULATION OF THE PARTIES, IT IS SO ORDERED.  Dated: June 2 , 2016  Reprosed ORDER PURSUANT TO THE STIPULATION OF THE PARTIES, IT IS SO ORDERED.  REPROPOSED ORDER PURSUANT TO THE STIPULATION OF THE PARTIES, IT IS SO ORDERED.  REPROPOSED ORDER PURSUANT TO THE STIPULATION OF THE PARTIES, IT IS SO ORDERED.  REPROPOSED ORDER PURSUANT TO THE STIPULATION OF THE PARTIES, IT IS SO ORDERED.  REPROPOSED ORDER PURSUANT TO THE STIPULATION OF THE PARTIES, IT IS SO ORDERED.  REPROPOSED ORDER PURSUANT TO THE STIPULATION OF THE PARTIES, IT IS SO ORDERED.  REPROPOSED ORDER PURSUANT TO THE STIPULATION OF THE PARTIES, IT IS SO ORDERED.  REPROPOSED ORDER PURSUANT TO THE STIPULATION OF THE PARTIES, IT IS SO ORDERED.  REPROPOSED ORDER PURSUANT TO THE STIPULATION OF THE PARTIES, IT IS SO ORDERED.	1	Dated: May 31, 2016	LAW OFFICE OF KENNETH C. ABSALOM
PURSUANT TO THE STIPULATION OF THE PARTIES, IT IS SO ORDERED.  Dated:	3 4		By: /s/ George R. Nemiroff Kenneth C. Absalom George R. Nemiroff Attorneys for Defendant INTERNATIONAL UNION OF OPERATING ENGINEERS LOCAL NO. 3
PURSUANT TO THE STIPULATION OF THE PARTIES, IT IS SO ORDERED.  Dated: June 2 , 2016  Dat	6		
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